IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	)	Group Art Unit: 2423
	)	
Kevin Lym	)	Examiner: Mendoza, Junior O.
	)	
Serial No.: 10/658,929	)	
	)	**REPLY BRIEF IN RESPONSE TO**
Filed: September 9, 2003	)	**EXAMINER'S ANSWER**
	)	
For: **INTELLIGENT ROUTING OF**	)	
DIGITAL CONTENT	)	162 N. Wolfe Rd.
	)	Sunnyvale, CA 94086
	)	(408) 530-9700
	)	
_____	)	Customer No. 28960

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In reply to the Examiner's Answer mailed on January 19, 2011, this Reply Brief is hereby submitted. Claims 1-54 have been rejected. The Appellant submits this brief to the Board of Patent Appeals and Interferences in compliance with the requirements of 37 C.F.R. § 41.41, as stated in *Rules of Practice Before the Board of Patent Appeals and Interferences (Final Rule)*, 69 Fed. Reg. 49959 (August 12, 2004).

The Appellant contends that the rejection of Claims 1-54 in this pending application is in error and should be overcome by this appeal. The appellant further contends that the Huang, Balog, Robbin, Malek, Colson and Mercer references do not support the rejection of Claims 1-54.

I.   SUMMARY OF THE CLAIMED INVENTION

The invention disclosed in the present application number 10/658,929 is directed to an application which automatically routes digital content to secondary devices and thereby overcomes the traditional problems present with downloading content to secondary devices. The digital content preferably includes file types such as movies, music, images, or anything else that might be stored on a secondary device like an MP3 player or a video recorder. Initially the user must download digital content from a server to the user's computer or set-top box. The routing application compares the file types or alternatively, meta data, of the downloaded content with set values that determine where the content is routed. When the secondary devices are coupled to the computer, the application determines, based on its current settings, which file type is routed to which secondary device and then distributes the files to the appropriate device.

II.   ARGUMENTS RELATED TO REJECTION OF CLAIMS 1, 5, 6-9, 11, 12, 16-22, 26-30, 41 and 52

A.   The teachings of Huang and Balog

Huang teaches a computer program that organizes and manages media files. The computer program includes a database management system for organizing data stored locally on a computer, and a graphical user interface (GUI) for selectively accessing the organized data. [Huang, ¶ 0025] This organization structure is nothing more than a relational database with pointers and indexes. [Huang, ¶ 0032] The media files being managed are locally stored and accessed. In general, there is no transmitting of data from the local computer to secondary devices, such as an MP3 player or a video recorder. In particular, there is no transmitting of data based on the organization of the media files. The Huang application is specifically designed to organize and manage data locally stored in a database on the local computer on which the application is loaded. As such, as recognized within the Examiner's Answer, Huang does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. [Examiner's Answer, page 4] Accordingly, Huang does not teach the presently claimed invention.

Balog teaches a method for delivering content to a plurality of mobile devices coupled to each other and participating in a communication network. The mobile devices interoperate via a

number of radio technologies such as the IEEE 802.11 wireless specification. [Balog, ¶ 0021] The content includes a plurality of data types and is delivered from a service provider to at least one of the mobile devices depending on the characteristics of the data and the characteristics of the device. [Balog, Abstract] Balog teaches that a user with a plurality of devices is able to define a list of preferred devices and create a mapping of the type of content that each of the devices can render. [Balog, ¶ 0031] However, Balog does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. Instead, Balog teaches that the content routing application of the mobility server 34 uses user profiles to route content to the correct user, at a specified time, using the most appropriate communication protocol and path to the preferred device. [Balog, ¶ 0029] The routing application of Balog does not detect which secondary devices are coupled to the computing device.

Within the Examiner's Answer, it is asserted that Balog's teaching of determining the status of the available devices (e.g. parked status, standby mode, or active status) "shows that the server of Balog does indeed 'detect' devices coupled to the server." [Examiner's Answer, page 28] The Appellants respectfully disagree. Even assuming arguendo that the "determining of status" taught by Balog is equivalent to the detecting coupled secondary devices, Balog would still fail to teach the claimed detecting because Balog does not explicitly or inherently teach that the determination of device status involves the detection of the devices 16.

Firstly, Balog does not explicitly teach the detecting of secondary devices by routing software because it does not teach *how* the status of the devices 16 is determined. Instead, Balog merely makes a general assertion that the statuses are determined, without providing any detail as to the manner in which they are determined. [Balog, ¶ 0036 et seq.] Furthermore, even looking to Balog's implied teachings, Balog implies that the determining does not involve the devices 16 at all, much less that the determining includes detection of the devices 26 by routing software. Specifically, Balog teaches that 1) "[e]ach of [the] devices 16 has specific device characteristics such as ... device status information ... [that is] compiled and archived in a device characteristics server 32," and 2) that "[t]he mobility server 34 obtains device characteristics [including the device status information] from the device characteristics server 32." [Balog, ¶ 0023 and 0031] Thus, one skilled in the art would conclude that Balog implies that the determining of device status merely involves the mobility server 34 (which stores the routing application) obtaining the device characteristics (including the device status information) from the device characteristics server 32, not from the devices 16 themselves. There is no reason to involve the devices 16 themselves if their device status information is already stored in the device characteristics server

32. Thus, at best, Balog implies that detection of the devices is not present in the determination of the status of the devices 16. Accordingly, Balog neither explicitly or implicitly teaches the detecting of secondary devices by routing software by its determination of device status.

Secondly, Balog also does not inherently teach the detecting of secondary devices by routing software by its determination of device status. Within the Examiner's Answer, the lack of explicit/implicit teaching described above, is attempted to be circumvented by asserting that "[b]ecause Balog teaches determining the status of devices 16 it must also *inherently* detect the device in order to correlate devices 16 with the server 34 for content routing." [Examiner's Answer, page 28 (emphasis added)] The Appellants respectfully disagree. Within the MPEP, it is stated that, "[t]he fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic. In re Rijckaert, 9 F.3d 1531, 1534 (Fed. Cir. 1993)" MPEP §2112 (IV). It is also stated that "[t]o establish inherency, the extrinsic evidence 'must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.' " In re Robertson, 169 F.3d 743, 745 (Fed. Cir. 1999) MPEP §2112 (IV). In this case, the detection of secondary devices via the determination of device status is clearly not "necessarily present." Instead, as described above, the device status can be determined without any interaction with the devices 16 themselves via the device characteristics stored on the device characteristics server 32. Indeed, there are numerous ways in which a device status can be determined without necessarily detecting whether a device is coupled. Accordingly, Balog does not inherently teach the detecting of secondary devices by routing software by its determination of device status because the detection is not necessarily present.

Additionally, the Appellants would like to point out that although it is asserted in the Examiner's Answer that the self-registration feature and determination of device status feature of Balog are independent and occur at different times, such independence and difference in time would not preclude the self-registration from being used in the determination of device status process. For example, the status of each device can be stored in the device characteristics server 32 at the time of device self-registration, and then this stored status information can be obtained, as described above, during the status determination step. Thus, again, the determination of status taught by Balog does not explicitly, impliedly or inherently teach the detection of the coupled devices by the routing software.

B. **The combination of Huang and Balog does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted**

Thus, in sum, Huang does not teach wherein the routing software <u>detects the secondary devices</u> coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. Further, Balog's mere general teaching of determining the status of devices is not the same as explicitly, impliedly or inherently teaching that the devices are detected by a routing software. More is required to justify such a rejection. As a result, neither Huang nor Balog teach wherein the routing software <u>detects the secondary devices</u> coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. Accordingly, neither Huang, Balog nor their combination teach the presently claimed invention.

In contrast to the combined teachings of Huang and Balog, the computing device of the presently claimed invention performs automatic content sorting and network routing by file type. The computing device has a central processing unit and a storage device. The storage device stores digital content downloaded from the server and a routing software application. The routing software compares the file types of the digital content with set values that determine where the digital content is routed. Specifically, the routing software utilizes a routing table that defines which type of file is associated with which secondary device. The routing software automatically detects which secondary devices are coupled to the computing device and selectively transmits the digital content to the appropriate secondary device(s) according to the routing table. As discussed above, neither Huang, Balog nor their combination teach wherein the routing software <u>detects the secondary devices</u> coupled to the computer and to compare the <u>data format</u> with a set of values that determine where the digital media content is to be transmitted.

The independent Claim 1 is directed to an apparatus for automatically routing digital information. The apparatus of Claim 1 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information and a routing software, wherein the routing software detects one or more secondary devices coupled to a computing device and to compare the type with a set of values that determine where the digital information is to be transmitted and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the type to the one or more secondary devices coupled to the computing device detected by the

routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 1 is allowable over the teachings of Huang, Balog, and their combination.

Claims 5-9 and 11 are dependent upon the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 5-9 and 11 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 12 is directed to an apparatus for automatically routing digital information from a computing device to one or more secondary devices. The apparatus of Claim 12 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information and a routing software, wherein the routing software detects the secondary devices coupled to the computing device and to compare the type with a set of values that determine where the digital information is to be transmitted, and a controller coupled to the storage device to automatically determine which type of digital information is routed to which secondary device and selectively transmit the digital information based on the type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 12 is allowable over the teachings of Huang, Balog, and their combination.

Claims 16-21 are dependent on the independent Claim 12. As discussed above, the independent Claim 12 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 16-21 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 22 is directed towards an apparatus for automatically routing digital media content from a computing device to one or more secondary devices. The apparatus of Claim 22 comprises an interface coupled to receive downloaded digital media content having a type, a storage device coupled to the interface to store the digital media content and a routing software, wherein the routing software detects the secondary devices coupled to the computing device and to compare the type with a set of values that determine where the digital media content is to be transmitted and a controller coupled to the storage device to automatically

determine which type of media content is routed to which secondary device utilizing a routing table and selectively transmit the digital media content based on the type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 22 is allowable over the teachings of Huang, Balog, and their combination.

Claims 26-30 are dependent on the independent Claim 22. As discussed above, the independent Claim 22 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 26-30 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 41 is directed to a method for routing digital information from a computing device to one or more secondary devices based on a routing software that compares a type with a set of values that determine where the digital information is to be transmitted. The method of Claim 41 comprises receiving the digital information having the type, automatically sorting the digital information based on the type, automatically detecting the secondary devices coupled to the computing device and automatically transmitting the digital information based on the type to a corresponding one or more of the secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 41 is allowable over the teachings of Huang, Balog, and their combination.

The independent Claim 52 comprises an apparatus for automatically routing digital information comprising media content of different media types including music, video and data. The apparatus of Claim 52 comprises an interface coupled to receive downloaded digital information having a media type, a storage device coupled to the interface to store the digital information and a routing software, the routing software detects one or more secondary devices coupled to a computer and to compare the media type with a set of values that determine where the digital information is to be transmitted and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the media type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that

compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 52 is allowable over the teachings of Huang, Balog, and their combination.

III. ARGUMENTS RELATED TO REJECTION OF CLAIMS 2, 13, 23, 31-33, 37, 40 and 42

A. The teachings of Huang, Balog and Malek

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted and detects which secondary devices are coupled to the computing device.

Malek teaches a method and apparatus for separately transporting each monomedia stream of a composite multimedia signal across a network, such as an ATM network. Malek generally teaches the transfer of packet information from one server to another. [Malek, col. 4, lines 6-27] The packets of Malek are embedded with addresses to determine the destination. Malek does not teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Malek does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Malek is only cited for the purpose of teaching a computing device coupled to the server, the server including digital information.

B. The combination of Huang, Balog and Malek does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted

Thus, because neither Huang, Balog or Malek teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device,

neither can their combination. Accordingly, neither Huang, Balog, Malek nor their combination teach the presently claimed invention.

In contrast to the combined teachings of Huang, Balog and Malek, the computing device of the presently claimed invention performs automatic content sorting and network routing by file type. The computing device has a central processing unit and a storage device. The storage device stores digital content downloaded from the server and a routing software application. The routing software compares the file types of the digital content with set values that determine where the digital content is routed. Specifically, the routing software utilizes a routing table that defines which type of file is associated with which secondary device. The routing software automatically detects which secondary devices are coupled to the computing device and selectively transmits the digital content to the appropriate secondary device(s) according to the routing table. As discussed above, neither Huang, Balog, Malek nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device.

The independent Claim 31 is directed to a network of devices for automatically routing digital information. The network of Claim 31 comprises a server including digital information, a computing device coupled to the server for obtaining and automatically transmitting the digital information based on the type, the computing device comprising routing software to compare a type with a set of values that determine where the digital information is to be transmitted and one or more secondary devices coupled to the computing device for receiving the digital information from the computing device, wherein the routing software detects the secondary devices coupled to the computing device. As discussed above, neither Huang, Balog, Malek nor their combination teaches a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 31 is allowable over the teachings Huang, Balog, Malek, and their combination.

Claims 32, 33, 37 and 40 are dependent upon the independent Claim 31. As discussed above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 32, 33, 37 and 40 are all also allowable as being dependent upon an allowable base claim.

Claim 2 is dependent on the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claim 2 is also allowable as being dependent upon an allowable base claim.

Claim 13 is dependent on the independent Claim 12. As discussed above, the independent Claim 12 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claim 13 is also allowable as being dependent upon an allowable base claim.

Claim 23 is dependent on the independent Claim 22. As discussed above, the independent Claim 22 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claim 23 is also allowable as being dependent upon an allowable base claim.

Claim 42 is dependent on the independent Claim 41. As discussed above, the independent Claim 41 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claim 42 is also allowable as being dependent upon an allowable base claim.

IV. ARGUMENTS RELATED TO REJECTION OF CLAIMS 3, 4, 14, 15, 24 and 25

Claims 3 and 4 are dependent on the independent Claim 1. Claims 14 and 15 are dependent on the independent Claim 12. Claims 24 and 25 are dependent on the independent Claim 22. As discussed above, the independent Claims 1, 12, and 22 are each allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 3, 4, 14, 15, 24, and 25 are all also allowable as being dependent upon an allowable base claim.

V. ARGUMENTS RELATED TO REJECTION OF CLAIMS 10, 43-45 and 47-50

A. The teachings of Huang, Balog and Robbin

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted and detects which secondary devices are coupled to the computing device.

Robbin is directed to intelligent synchronization of a media player with a host computer. Specifically, Robbin teaches synchronization can be automatically initiated and performed upon connection of a data link between the media player and the hose computer. [Robbin, Abstract] However, Robbin does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted

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and detects which secondary devices are coupled to the computing device. Accordingly, Robbin does not teach the presently claimed invention.

B. **The combination of Huang, Balog and Robbin does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted**

Thus, because neither Huang, Balog or Robbin teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device, neither can their combination. Accordingly, neither Huang, Balog, Robbin nor their combination teach the presently claimed invention.

In contrast to the combined teachings of Huang, Balog and Robbin, the computing device of the presently claimed invention performs automatic content sorting and network routing by file type. The computing device has a central processing unit and a storage device. The storage device stores digital content downloaded from the server and a routing software application. The routing software compares the file types of the digital content with set values that determine where the digital content is routed. Specifically, the routing software utilizes a routing table that defines which type of file is associated with which secondary device. The routing software automatically detects which secondary devices are coupled to the computing device and selectively transmits the digital content to the appropriate secondary device(s) according to the routing table. As discussed above, neither Huang, Balog, Robbin nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device.

The independent Claim 45 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 45 comprises receiving the digital information having a type, automatically detecting the secondary devices coupled to the computing device with routing software that compares the type with a set of values that determine where the digital information is to be transmitted, automatically sorting the digital information based on the type and automatically transmitting the digital information to a corresponding one or more of the secondary devices based on the type. As discussed above, neither Huang, Balog, Robbin nor their combination teach a routing software that compares the

type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 45 is allowable over the teachings of Huang, Balog, Robbin and their combination.

Claim 47 is dependent on the independent Claim 45. As described above, the independent Claim 45 is allowable over the teachings of Huang, Balog, Robbin and their combination. Accordingly, Claim 47 is also allowable as being dependent on an allowable base claim.

Claims 10 and 48 are dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claims 10 and 48 are both also allowable as being dependent upon an allowable base claim.

Claim 49 is dependent on the independent Claim 12. As described above, the independent Claim 12 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claim 49 is also allowable as being dependent upon an allowable base claim.

Claim 50 is dependent on the independent Claim 22. As described above, the independent Claim 22 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claim 50 is also allowable as being dependent upon an allowable base claim.

Claims 43 and 44 are dependent on the independent Claim 41. As described above, the independent Claim 41 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claims 43 and 44 are both also allowable as being dependent upon an allowable base claim.

VI. ARGUMENTS RELATED TO REJECTION OF CLAIMS 34 and 51

Claims 34 and 51 are dependent on the independent Claim 31. As described above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 34 and 51 are both also allowable as being dependent upon an allowable base claim.

VII.   ARGUMENTS RELATED TO REJECTION OF CLAIMS 35, 36, 38 and 39

Claims 35, 36, 38 and 39 are dependent on the independent Claim 31. As described above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 35, 36, 38 and 39 are all also allowable as being dependent upon an allowable base claim.

VIII.   ARGUMENTS RELATED TO REJECTION OF CLAIM 46

Claim 46 is dependent on the independent Claim 45. As described above, the independent Claim 45 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claim 46 is also allowable as being dependent upon an allowable base claim.

IX.   ARGUMENTS RELATED TO REJECTION OF CLAIMS 53 and 54

A.   The teachings of Huang, Balog and Colson

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device.

Colson is directed to a method and system for receiving and demultiplexing multi-modal document content. Specifically, Colson teaches that each content type of the multipart document is located by a component and used to locate an appropriate content renderer. [Colson, Abstract] However, Colson does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Indeed, Colson is only cited for the purpose of teaching wherein the routing software compares the <u>data format</u> with a set of values that determine where the digital media content is to be transmitted. Accordingly, Colson does not teach the presently claimed invention.

B. **The combination of Huang, Balog and Colson does not teach wherein the
routing software detects the secondary devices coupled to the computer and
to compare the type with a set of values that determine where the digital
media content is to be transmitted**

Thus, because neither Huang, Balog or Colson teach a routing software that compares the
type of the digital information with a set of values that determine where the digital information is
to be transmitted *and* detects which secondary devices are coupled to the computing device,
neither can their combination. Accordingly, neither Huang, Balog, Colson nor their combination
teach the presently claimed invention.

In contrast to the combined teachings of Huang, Balog and Colson, the computing device
of the presently claimed invention performs automatic content sorting and network routing by
file type. The computing device has a central processing unit and a storage device. The storage
device stores digital content downloaded from the server and a routing software application. The
routing software compares the file types of the digital content with set values that determine
where the digital content is routed. Specifically, the routing software utilizes a routing table that
defines which type of file is associated with which secondary device. The routing software
automatically detects which secondary devices are coupled to the computing device and
selectively transmits the digital content to the appropriate secondary device(s) according to the
routing table. As discussed above, neither Huang, Balog, Colson nor their combination teach a
routing software that compares the type of the digital information with a set of values that
determine where the digital information is to be transmitted *and* detects which secondary devices
are coupled to the computing device.

The independent Claim 53 comprises a method for routing digital information based on a
routing software that compares a data format with a set of values that determine where the digital
information is to be transmitted, the digital information comprising media content of different
data formats from a computing device to one or more secondary devices. The method of Claim
53 comprises receiving the digital information having the data format automatically sorting the
digital information based on the data format, automatically detecting the secondary devices
coupled to the computing device and automatically transmitting the digital information based on
the data format to a corresponding one or more of the secondary devices coupled to the
computing device detected by the routing software. As discussed above, neither Huang, Balog,
Colson nor their combination teach a routing software that compares the type of the digital
information with a set of values that determine where the digital information is to be transmitted

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and detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 53 is allowable over the teachings of Huang, Balog, Colson and their combination.

The independent Claim 54 comprises an apparatus for automatically routing digital media content of different data formats from a computing device to one or more secondary devices. The apparatus of Claim 54 comprises an interface coupled to receive downloaded digital media content having a data format, a storage device coupled to the interface to store the digital media content and a routing software, the routing software detects the secondary devices coupled to the computing device and to compared the data format with a set of values that determine where the digital media content is to be transmitted and a controller coupled to the storage device to automatically determine which data format of media content is routed to which secondary device utilizing a routing table, the routing table comprising a data format column and a device column and selectively transmit the digital media content based on the data format to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog, Colson nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted and detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 54 is allowable over the teachings of Huang, Balog, Colson and their combination.

X.   CONCLUSION

Accordingly, it is respectfully submitted that Claims 1-54 are allowable over the teachings of Huang, Balog, Malek, Robbin, Mercer and Colson. Therefore, a favorable indication is respectfully requested.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

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